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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Mona Denise Salazar,
Plaintiff,

vs.

Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

Case No. 1:22-cv-01182-AWI-GSA
STIPULATION AND ORDER FOR
EXTENSION OF TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from March 6, 2023 to May 5, 2023, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for the requested extension. For the weeks of February 27, 2023 and March

6, 2023, Counsel currently has 10 merit briefs, and several letter briefs and reply briefs. Additional time is needed to thoroughly brief this matter for the Court.

Additionally, undersigned Counsel is currently in Texas caring for her terminally ill father as Counsel is a primary caregiver.

Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: February 28, 2023 PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Dolly M. Trompeter
DOLLY M. TROMPETER
Attorneys for Plaintiff

Dated: February 28, 2023 PHILLIP A. TALBERT
United States Attorney
PETER K. THOMPSON
Acting Regional Chief Counsel, Region IX
Social Security Administration

By: */s/ Margaret Lehrkind
Margaret Lehrkind
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on Feb. 28, 2023)

ORDER

IT IS SO ORDERED.

Dated: March 3, 2023

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE

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